

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CERVECERÍA MODELO DE MÉXICO,
S. DE R.L. DE C.V.,

Plaintiff,

vs.

CB BRAND STRATEGIES, LLC,
CROWN IMPORTS LLC, and
COMPAÑÍA CERVECERA DE
COAHUILA, S. DE R.L. DE C.V.,

Defendants.

Case No.: 1:21-cv-01317-LAK

ECF Case

**DECLARATION OF SARA S. TATUM IN SUPPORT OF DEFENDANTS’
REPLY IN SUPPORT OF DEFENDANTS’ MOTION TO DISMISS**

I, Sara S. Tatum, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

I am an associate with the law firm of Kirkland & Ellis LLP. My firm represents Defendants CB Brand Strategies, LLC; Crown Imports LLC; and Compañía Cervecería de Coahuila, S. de R.L. de C.V. (collectively, “Defendants”) in the above-captioned action. I submit this declaration in support of Defendants’ Reply in Support of Defendants’ Motion to Dismiss. I have personal knowledge of the facts stated herein, and I am competent to testify to the matters set forth below.

1. Attached hereto as Exhibit 1 is a true and correct copy of the Signed Order for *Ira Nachem v. Property Markets Group, Inc., et al.*, Index No. 603145/07 (N.Y. Sup. Ct.), dated August 4, 2010.

2. Attached hereto as Exhibit 2 is a true and correct copy of the Corona Hard Seltzer Webpage, <https://coronausa.com/pages/corona-seltzer>, last viewed on June 5, 2021.

3. Attached hereto as Exhibit 3 is a true and correct copy of the Alcohol and Tobacco Tax and Trade Bureau's *Modernization of the Labeling and Advertising Regulations for Wine, Distilled Spirits, and Malt Beverages*, dated April 2, 2020.

4. Attached hereto as Exhibit 4 is a true and correct copy of FactSet CallStreet, LLC's, *Corrected Transcript of Constellation Brands, Inc. Q4 2020 Earnings Call*, dated April 3, 2020.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed: June 7, 2021
New York, New York

A handwritten signature in black ink, appearing to read 'S. Tatum', written over a horizontal line.

Sara S. Tatum